

**REMARKS**

Claims 1-10, 13, 17-26, and 28-101 are pending in the application.

Claims 1-10, 13, 17-26, and 28-101 have been rejected.

**Rejection of Claims under 35 U.S.C. § 103(a)**

Claims 1-10, 13, 17-22, 24-26, 28-42, 45-56, 58-64, and 66-101 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,332,154 issued to Beck et al. (“Beck”) in view of U.S. Patent No. 6,763,369 issued to Ytuarte et al. (“Ytuarte”). Applicants respectfully traverse this rejection.

Applicants respectfully submit that neither Beck nor Ytuarte, alone or in permissible combination, teaches or suggests each feature recited in Applicants’ claims. For example, Applicants respectfully submit the cited references fail to teach at least the following features of claim 1:

“receiving an activation of a work item object of the user interface, the work item object being associated with the work item, wherein the activation of the work item object is associated with selecting one communication channel of the plurality of communication channels for working on the work item;  
accessing a user interface object table to identify a command associated with the activation of the work item object;  
accessing a command table to identify a channel driver comprising the command associated with the activation of the work item object; and  
causing the channel driver to issue the command from the communication center to an outgoing communication channel of the communication channels.”

The Office Action cites Beck 57:22-58:10 as purportedly teaching “receiving an activation of a work item object of the user interface, the work item object being associated with the work item, wherein the activation of the work item object is associated with selecting one communication channel of the plurality of communication

channels for working on the work item". *See* Office Action, pages 3-4. Applicants respectfully disagree. The cited passage reads:

Various media presentation modules are provided and adapted to provide instruction as to how workload will be presented to an agent or group of agents. These are a push module 401, a push/blend module 403, a publish and subscribe module 405, and an interrupt module 407.

Push module 401 is adapted to accept input instruction such as what media type will be pushed to an agent, as well as time constraints related to when and for how long a selected media type will be pushed. For example, it may be that a certain agent such as agent B is a trainee and will only be allowed to answer e-mails regarding general inquiries. In such a case, perhaps only push module 401 will be enabled with e-mail inquiries as the selected media as long as agent B is classified as a trainee. Another, more technical reason for a push model rule, might be that an off-site agent (not shown), due to limited line capacity will not get a video conference call, even though he may have the skill profile required to handle the call.

It is important to note here that in an event that agent B is upgraded from a trainee to a level allowing more responsibility, AWPM 389 will access such updated data from ADB 387 and automatically configure additional options for agent B the next time he logs on to CINOS. For example, an administrator or authorized supervisor enters updated data into ADB 387 concerning the new status of agent B such as a new media type allowed, call parameters (e.g. sales or service, etc.) associated with the selected media type, time constraints regarding the new media, and method of presentation for the new media. If, for example, the new media and call parameter is incoming COST service-related calls, and the method of delivery is input as push for a specific time period while retaining agent B's prior e-mail responsibility, then push/blend module 403 will take over and provide new instruction for agent B's new workload.

Push/blend module involves pushing more than one media type for specific pre-planned time periods. For example, e-mail may be pushed for one-half of a work period while IPNT sales calls are pushed for the remainder of the work period. In some embodiments, e-mail, COST calls and IPNT calls may be pushed for different time periods with overlapping time periods possible.

Publish and subscribe module 405 involves an agent or group of agents such as one or more of agents A-D subscribing to selected work queues of selected media types. For example, agent D may be allowed to subscribe to COST calls from a specific queue while also subscribing to IPNT calls from a different queue. Time spent in each queue may be indicated as an enterprise rule time constraint. In another instance agent D may have

complete control over time spent working each queue.

Interrupt module 407 allows certain interactions of any media type to be pushed to an agent in prioritized fashion. An example of this would be if agent A is answering pushed e-mails (module 401) but is interrupted (interrupt module) for sales calls when other agents are busy.

Beck 57:22-58:10 (cited at Office Action, pages 3-4). The cited passage discloses details of Beck's AWPM (Agent Work Presentation Model), which is simply a way of determining which items an agent should be presented with, or notified of. *See* Beck 53:65-67. At best, each of the modules described in the cited passage is a different way to determine what type of work an agent will be notified of, *i.e.*, whether the agent will be notified of phone calls or emails, and the fashion in which the agent will receive the notification.

However, the cited passage does not suggest the existence of a work item object of the user interface, wherein the object is associated with a work item. As the claim language makes clear, a work item object is an object which may be (and is) activated. This activation occurs after a work item comes in and notification of the work item is provided via a user interface. So in Beck, it is only after notification of the work item is provided via the user interface that a work item object is activated. The cited passage fails to teach any concept analogous to activating a work item object of a user interface.

The Office Action cites Beck 40:20-32, 40:42-42:22, and 58:27-43 as purportedly teaching "accessing a user interface object table to identify a command associated with the activation of the work item object." *See* Office Action, page 4. Applicants respectfully disagree. As discussed above, Applicants respectfully submit that the cited passages of Beck fail to disclose activation of a work item object. Therefore, it follows that the cited passages could not (and do not) disclose accessing a user interface object table to identify a command associated with the activation. Further, as discussed in the previous response, a command is not comparable to a parameter. The cited passages disclose a module "adapted to disseminate parameters" and not to identify a command.

The Office Action cites Beck 58:27-42 as purportedly teaching "accessing a command table to identify a channel driver comprising the command associated with the

activation of the work item object”. *See* Office Action, pages 4-5. Applicants respectfully disagree. The cited passage reads:

Other modules provided to assist modules 401-407 include a mediainterface module 409 that is provided and adapted to disseminate parameters associated with media interactions such as may be stored in various communication-center queues. Audio recognition and text parsing technology may be included in the capability of module 409 thus enabling it to aid in the selection of interactions according to enterprise rules and agent-data parameters stored in ADB 387. A routing-system interface module 411 provides interfacing capability to various CINOS routing systems 393. Internal routing of all interactions to agents such as agents A-D is integrated with AWPM 389 as required to effect various presentation options exemplified by modules 401-407.

Beck 58:27-42 (cited at Office Action, pages 4-5). The above passage discloses a routing-system interface module, which the Office Action equates with a command table. *See* Office Action, pages 4-5. The routing-system interface is disclosed as serving CINOS routing-systems in internal routing to agents. Applicants submit that interpreting Beck’s routing-system interface module as the claimed command table is a strained interpretation. In any case, the cited passage fails to teach or suggest identifying a channel driver with which a given command is associated, as claimed.

The Office Action states that Beck does not disclose causing the channel driver to issue the command from the communication center to an outgoing communication channel. *See* Office Action, page 5. The Office Action goes on to cite Ytuarte 3:35-63 as purportedly supplying this missing disclosure. Applicants respectfully disagree. The cited passage reads:

Referring additionally to FIG. 2, further details of center 30 and CT server 40 are illustrated. In this embodiment, CT server 40 is operatively connected to hardware components ACD (automatic communication distributor) 102, interactive voice response unit 104, voice mail system 106, and facsimile server hardware 108. Control process 101 executes on CT server 40 to coordinate the subsystems of the server 40 as described in further detail below. Physical subsystem hardware components 102, 104, 106, and 108 are driven by driver processes 103, 105, 107, and 109, respectively, which are executed by processor 44. These driver processes 103, 105, 107, and 109 translate commands issued by control process 101 using a device application programming interface (API) to control those devices at the device level.

Ytuarte 3:35-63 (cited at Office Action, page 5). The above passage discloses device drivers, each of which is used to control a specific physical subsystem hardware component, which is connected to the CT server. Applicants respectfully submit that such disclosure does not teach or suggest the claimed channel drivers, each of which is configured to control a communication channel and may support not only multiple types of devices, but also multiple types of media.

Further, Applicants respectfully submit that one of ordinary skill would not be motivated to combine Beck and Ytuarte. The Office Action states that one of ordinary skill would be motivated to make the combination because this would allow the AWPM of Beck to control the communication channel devices at the device level and allow the agents of Beck's system to communicate with customers through a variety of communication channels. However, Applicants point out that the agents of Beck's system are already provided a means to communicate with customers through a variety of communication channels. The Office Action explicitly states as much on page 5, ("Beck teaches a communication center that communicates with a customer via multiple channels.") And Applicants are unable to see the utility of allowing the agents of Beck's system to control communication channel devices at the device level. In fact, the whole point of Beck is a customer *self-help* system wherein customers are able to resolve issues *without using agent resources*. See Beck 4:7-15 (emphasis supplied). It is wholly counterintuitive to attempt to modify Beck to result in agents having a greater role in customer support actions. Applicants respectfully submit that the Office Action fails to state a permissible motivation to combine Beck and Ytuarte, *i.e.*, a motivation drawn from the references themselves.

Thus, for at least these reasons and other infirmities associated with the Office Action's interpretation of Beck, the Applicants further request the reconsideration and withdrawal of this rejection against claim 1. For similar reasons the Applicants request the reconsideration and withdrawal of this rejection against independent claims 13, 17, 19, 21, 22, 39, 46, 54, 59, 67, 84 and 85.

For at least the reason that all remaining rejected claims are dependent upon independent claims 1, 13, 17, 19, 21, 22, 39, 46, 54, 59, 67, 84 and 85, Applicants request the reconsideration and withdrawal of this rejection against all remaining rejected claims.

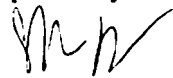
Claims 23, 43, 44, 57 and 65 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Beck and Ytuarte further in view of U.S. Patent No. 6,587,556 issued to Judkins et al. ("Judkins"). Applicants respectfully traverse this rejection. Claims 23, 43, 44, and 57 and 65 depend, respectively, upon allowable base claims 22, 39, 54, and 59. Therefore, Applicants respectfully assert that these claims are likewise allowable, at least by virtue of depending from allowable base claims.

### **CONCLUSION**

In view of the amendments and remarks set forth herein, the application and the claims therein are believed to be in condition for allowance without any further examination and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is invited to telephone the undersigned at 512-439-5092.

If any extensions of time under 37 C.F.R. § 1.136(a) are required in order for this submission to be considered timely, Applicant hereby petitions for such extensions. Applicant also hereby authorizes that any fees due for such extensions or any other fee associated with this submission, as specified in 37 C.F.R. § 1.16 or § 1.17, be charged to Deposit Account 502306.

Respectfully submitted,



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